

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MICRO FOCUS INTERNATIONAL PLC
SECURITIES LITIGATION

Master File No. 1:18-cv-06763 (ALC)

ECF CASE

**NOTICE OF LEAD PLAINTIFF'S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT AND AUTHORIZATION TO
DISSEMINATE NOTICE OF SETTLEMENT**

TO: All Counsel of Record

PLEASE TAKE NOTICE that based on the Stipulation and Agreement of Settlement dated June 16, 2021 (the "Stipulation"), attached as Exhibit 1 to the accompanying Declaration of James A. Harrod; the accompanying Memorandum of Law; and all other papers and proceedings herein, Lead Plaintiff Iron Workers Local No. 25 Pension Fund ("Lead Plaintiff") hereby moves this Court, under Rule 23(e)(1) of the Federal Rules of Civil Procedure, for preliminary approval of the proposed Settlement so that notice may be provided to the Settlement Class.¹ Specifically, Lead Plaintiff respectfully requests that the Court enter an order: (i) preliminarily approving the proposed Settlement; (ii) approving the form and manner of providing notice to the Settlement Class Members; and (iii) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel's motion for an award of attorneys' fees and expenses. The Parties' agreed-upon [Proposed] Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement is submitted with this Motion. In accordance

¹ All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

with the terms of the Stipulation, Defendants do not oppose the Motion and Lead Plaintiff believes that the Motion is appropriate for resolution without a hearing.

Dated: June 17, 2021

Respectfully submitted,

/s/ James A. Harrod

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